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BRIDGEWATER GROUP, INC.

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October 5, 2001

Mr. Tom Gainer  
Oregon Department of Environmental Quality  
2020 SW Fourth Ave., Suite 400  
Portland, OR 97201-4987

Subject: Crawford Street Corporation Site  
Black Sand Removal Action Work Plan

Dear Mr. Gainer:

Enclosed please find three copies of the final, October 5, 2001, *Black Sand Removal Action Work Plan* for the Crawford Street Corporation site in Portland, Oregon. The work plan has been revised based on your comments on the August 28, 2001, *Draft Black Sand Removal Action Work Plan*. DEQ's comments were presented in a letter from you dated September 13, 2001. We also discussed these comments with you during a September 26, 2001 meeting. Crawford Street Corporation's (CSC's) specific responses to DEQ's comments on the draft work plan are presented below.

### **Response to DEQ's Comments**

For each comment response, DEQ's comment is first presented (in italics) with CSC's response following (indented and not italicized).

#### **DEQ Comment 1**

*Section 1.2.2/Table 1-2. The lower of either MacDonald TECs or NOAA TELs should be used for ecological screening.*

The tables and text have been revised to reflect that the measured contaminant concentrations will be assessed relative to both the MacDonald TECs and NOAA TELs.

#### **DEQ Comment 2**

*Section 2.2.5. Baseline sampling of surface soils should be performed prior to the placement of the plastic liner. Sampling should also be performed following removal of the stockpile and liner to demonstrate the on-site management did not result in a release of hazardous substances.*

The Work Plan has been revised to include sampling beneath the stockpile area if such sampling is deemed appropriate based on visual inspection of the underlying ground and the liner condition after the stockpile has been removed.

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**DEQ Comment 3**

*Section 2.2.5. The work plan should indicate that a hazardous waste determination will be performed on the black sand stockpiled on-site in accordance with OAR 340-102-011, 40 CFR 261, and US EPA SW-846 Test Methods for Evaluating Solid Waste. Sampling procedures and analytical methods should be presented in the work plan. One discrete sample per 50 cubic yards soil is reasonable for such characterization, and the sampling should be conducted within seven days after the excavated soil is stockpiled.*

The text has been revised and amended as requested. The stockpile samples will be analyzed for TCLP lead. Previous testing, visual observation, and anecdotal information regarding the black sand does not indicate any other analysis is necessary for the hazardous waste determination.

**DEQ Comment 4**

*Section 2.2.5. The final disposition of the black sand material should be implemented within 90 days of stockpiling. The work plan should discuss options for the final disposition of the black sand material, including potential applicability of RCRA Land Disposal Restrictions.*

Text has been added to the Work Plan reflecting DEQ's comment. As we discussed during our September 26, 2001 meeting, it is our understanding that the 90-day period will be extended if necessary to adequately assess the black sand management options and manage the black sand in the most appropriate manner.

**DEQ Comment 5**

*Section 2.2.6. Analysis of post-excavation confirmation samples should include total petroleum hydrocarbons and mercury.*

The text has been revised and amended accordingly.

**DEQ Comment 6**

*Section 3.3. The report should include the "Hazardous Waste Determination" for the black sand. Documentation of the disposal of the black sand (e.g., manifests) and closure of the waste pile should be submitted for DEQ review and approval.*

The text has been revised and amended accordingly. Given that DEQ requests that the removal report be submitted within 45 days of completion of the field activities (see Comment 7 below) and the 90 day deadline for managing the stockpiled black sand (see Comment 4 above), the final disposition of the black sand may not be determined until after the report is submitted. The Work Plan has been revised to note that if this is the case, a separate report summarizing and documenting the final disposition of the black sand will be submitted to DEQ.

**DEQ Comment 7**

*Section 5. The schedule should include a target date or specific time period (i.e., 45 days following completion of the removal) when the removal report will be submitted. The schedule should include removal of the black sand stockpile.*

The text has been revised accordingly.

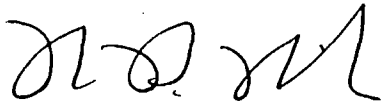
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DEQ  
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**Summary**

Thank you for your comments on the removal work plan. Please review our responses and we can discuss further, if necessary. Based on our recent discussions with the COE and our understanding that the processes and practices described in the enclosed work plan meet the substantive requirements of the DSL permit, we are tentatively planning to perform the beach removal work on October 18, 2001. We will continue to update you on the final schedule as well as our continued discussions with the COE regarding their permit. In the meantime, please call if you have any questions.

Sincerely,

BRIDGEWATER GROUP, INC.



Ross D. Rieke, P.E.  
Vice President  
Environmental Consultant

cc: Mat Cusma/Crawford Street Corporation  
Mark Reeve/Reeve Kearns